have been cancelled. The title has been changed in accordance with the elected claims.

In items 1 and 2 on page 2 of the above-identified Office action, the Examiner noted that claims 1-11 had been selected for prosecution without traverse and that claims 12-14 had been withdrawn from further consideration.

Claims 12-14 have been cancelled.

In item 5 on page 3 of the Office action, claims 1-7 have been rejected as being anticipated by Kuriyama (5,682,057) under 35 U.S.C. § 102. Applicant respectfully traverses.

Claim 1 defines a step of providing a second integrated circuit having a terminal that is coupled to a protective structure for protecting against electrostatic discharges.

The Examiner has alleged that the reference teaches such a step. The only protective structure that the reference teaches is the narrow portion 10c of the conductor strip 10 of the fuse. The narrow portion 10c acts to prevent non-illustrated electronic components in the load path from being damaged due to high currents that may be provided by the power transistor when the transistor becomes heated during operation (See column 3, lines 55-67 and column 1, lines 12-21). The

reference specifically teaches that the conductor strip 10 is formed from a low-melting point metal film (See column 3, lines 27-32). The narrow portion 10c is melt-cut by excessive heat supplied to the fuse 7 by the power transistor on the semiconductor chip 3. The narrow portion 10c of the conductor strip 10 is simply a heat responsive conductor that will not protect against electrostatic discharge. There is no teaching that the narrow portion 10c of the conductor strip 10 could be somehow specially constructed such that it will be responsive to electrostatic discharge and there is no teaching suggesting that the narrow portion 10c is provided to address the problems presented by electrostatic discharge. It should, therefore, be clear that the narrowed conductor strip 10c is not a protective structure for protecting against electrostatic discharge.

Claims 15-18 have been added to even further distinguish the invention from the prior art. Support for added claims 15-17 can be found by referring to the specification at page 2, lines 4-13 and page 12, lines 13-17 (claim 15); page 12, lines 8-11 and page 13, lines 4-13 (claim 16); and at page 14, lines 3-6 (claim 17). Support for added claim 18 can be found by referring to the specification at page 13, line 21 through page 14, line 6.

In regard to claim 15, the reference does not provide any teaching regarding protective structures for protecting against electrostatic discharges. In regard to claims 16 and 17 respectively, the reference does not teach severing an electrically conductive connection by applying a current to the connection or by applying a laser beam thereto. The reference teaches that the constriction 10c is severed by heat supplied thereto by the power transistor. In regard to claim 18, the reference teaches that the constriction 10c can be severed only after packaging when the power transistor is in operation.

In item 7 on page 4 of the Office action, claims have been rejected as being obvious over Kuriyama (5,682,057) in view of Bozso et al. (5,760,478) under 35 U.S.C. § 103. Applicant respectfully traverses.

Claim 8 defines a step of electrically coupling at least the first terminal pad of the second integrated circuit to a protective structure for protecting against electrostatic discharges.

Kuriyama does not teach anything regarding a protective structure for protecting against electrostatic discharges.

Therefore, even if there were a suggestion to combine the teachings and even if Bozso teaches the features as alleged by

the Examiner, the invention as defined by claim 8 would not have been obtained.

It is accordingly believed to be clear that none of the references, whether taken alone or in any combination, either show or suggest the features of claim 1 or 8. Claims 1 and 8 are, therefore, believed to be patentable over the art and since all of the dependent claims are ultimately dependent on claim 1 or claim 8, they are believed to be patentable as well.

In view of the foregoing, reconsideration and allowance of claims 1-11 and 15-18 are solicited.

In the event the Examiner should still find any of the claims to be unpatentable, the Examiner is respectfully requested to telephone counsel so that, if possible, patentable language can be worked out.

Please charge any fees that might be due with respect to Sections 1.16 and 1.17 to the Deposit Account of Lerner and

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Respectfully submitted,

For Applicant

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